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VIA ECFS

August 3, 2017

Michael Wilhelm, Acting Division Chief
Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ***Wireless E911 Location Accuracy Requirements***
Implementation Plan and Progress Report
AST Telecom, LLC d/b/a BlueSky Communications
PS Docket No. 07-114

Dear Mr. Wilhelm:

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of AST Telecom, LLC d/b/a BlueSky Communications ("BlueSky"), a non-nationwide Commercial Mobile Radio Service provider, is the company's indoor location accuracy Implementation Plan and Progress Report.

BlueSky has filed a request for a temporary waiver of the performance and reporting requirements of FCC Rule Section 20.18(i) that remains pending before the Commission in the above-captioned proceeding.[1]

Should you require additional information or have any questions, please do not hesitate to contact me.

Respectfully submitted,

Todd B. Lantor
Counsel for AST Telecom, LLC
d/b/a BlueSky Communications

Enclosure

[1] *See* AST Telecom, LLC d/b/a BlueSky Communications Petition for Temporary Waiver, PS Docket No. 07-114 (filed Apr. 3, 2017).

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E911 Location Accuracy Implementation Plan and Progress Report
47 C.F.R. § 20.18(i)(4)(i) and (ii)
PS Docket No. 07-114

AST Telecom, LLC d/b/a BlueSky Communications (BlueSky) is a non-nationwide provider of Commercial Mobile Radio Services (CMRS). Set forth below is BlueSky's progress toward meeting compliance deadlines prescribed by the Federal Communications Commission in *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, PS Docket No. 07-114, FCC 15-9 (released Fed. 3, 2015) (*Fourth Report and Order*), and codified in 47 C.F.R. § 20.18(i), *et seq*. Also provided is BlueSky's Implementation Plan for meeting the Commission's indoor location accuracy requirements.

Progress Report

BlueSky diligently maintains knowledge of the location accuracy rules and investigates technical requirements necessary to provide public safety with accurate location data for emergency callers. To date, however, no Public Safety Answering Point (PSAP) in BlueSky's service area, American Samoa, has requested or become capable of receiving or utilizing indoor location data or Phase II Enhanced 911 (E911) location data.

Nevertheless, BlueSky has timely performed its *Fourth Report and Order* location accuracy reporting obligations:

February 3, 2017

The Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114, providing aggregate live 911 call data covering reporting period October through December 2016. As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities and that does not deliver Phase II location data to PSAPs, BlueSky's 911 live call data was collected and reported based on non-Phase II calls to 911. The report was sent to the National Emergency Number Association (NENA), the Association of Public-Safety Communications Officials (APCO) and the National Association of State 911 Administrators (NASNA).

August 1, 2017

BlueSky's second Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114, providing aggregate live non-Phase II 911 call data

covering reporting period April through June 2017. The report was sent to NENA, APCO and NASNA.

BlueSky retains for two years all testing and live call data gathered for Non-Nationwide Carrier Live 911 Call Reports.

On April 3, 2017 BlueSky submitted to the Commission a request for waiver of 47 C.F.R. § 20.18(i) "Indoor location accuracy for 911" Rules and associated testing and reporting requirements because BlueSky's service area includes no PSAPs capable of receiving or using E911 or indoor location data.

In its waiver request, BlueSky believes it demonstrates that the underlying purpose of 47 C.F.R. § 20.18(i) is not served by requiring it to implement technical capability to supply E911 location information to public safety authorities that are incapable of receiving and processing the information. Likewise, in accordance with 47 C.F.R. § 20.18(m)(1), BlueSky believes it is not required to support Phase II location under 47 C.F.R. §§ 20.18(e)-(h) due to the lack of PSAP Phase II capability to receive the enhanced location information.

Regarding 47 C.F.R. § 20.18(i)(2)(i)(B)(1), by April 3, 2017 BlueSky has not begun to provide dispatchable location or x/y location information within 50 meters for 40 percent of all wireless 911 calls. No PSAP in BlueSky's service area has requested or become capable of receiving and utilizing E911 call location data. Accordingly, by June 2, 2017 BlueSky did not submit to the FCC certification required by 47 C.F.R. § 20.18(i)(2)(iii) that as of April 3, 2017 BlueSky provided service or report live call data in one or more of the Test Cities, was providing dispatchable location or x/y location information within 50 meters for 40 percent of all wireless 911 calls, had deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed, or had verified based on its own live call data that it was in compliance with the two-year benchmark set forth at 47 C.F.R. § 20.18(i)(2)(i)(B)(1). Without a PSAP in its service area that has requested or become capable of receiving or utilizing 911 call location data, BlueSky is unable to fulfill the location accuracy requirements of 47 C.F.R. § 20.18(i)(2)(i)(B)(1).

Implementation Plan

BlueSky's compliance with FCC indoor location accuracy requirements of 47 CFR § 20.18, including subsections (i)(2)(i) and (i)(2)(ii), *i.e.*, horizontal and vertical location, will evolve according to the capabilities and advancements of PSAPS and critical vendors.

Local public safety officials will follow their own path to secure funding and upgrade technical capabilities for Phase II E911 services. When a PSAP becomes capable of receiving, processing and utilizing location data, BlueSky will implement a solution for delivery. BlueSky is prepared to begin providing Phase II and indoor location information required under 47 C.F.R. §§ 20.18(e)-(i) within six months of receipt of a request from a PSAP for Phase II location data, per 47 C.F.R. §§ 20.18(f) and (g)(2).

Participation by state and local authorities is essential for BlueSky to perform its role in facilitating E911 location services. When E911 systems are activated, BlueSky will work to incorporate technological advancements to deliver accurate and useful location information to emergency dispatch personnel. BlueSky remains mindful of FCC Rules' schedule of requirements:

2018

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

April 3 - Deliver to PSAPs either "dispatchable location" or "x/y location within 50 meters," for 50 percent of 911 calls

April 3 - Provide with wireless 911 calls that have a dispatchable location, upon the request of a PSAP, x- and y-axis (latitude, longitude) confidence and uncertainty information (C/U data) on a per-call basis, specifying the caller's location and the radius in meters from the reported position with a uniform confidence level of 90 percent, per 47 C.F.R. § 20.18(j)(2). Collect and retain the data for two years, and make the data available to PSAPs upon request, per 47 CFR § 20.18(k).

June 2 - Submit 911 location accuracy certification to FCC

August 3 - Deliver to PSAPs uncompensated barometric data from any handset that has the capability to deliver barometric sensor data

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

August 3 - Submit implementation plan and progress report to FCC

October 2 - Submit 911 location accuracy certification to FCC

2019

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

2020

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

April 3 - Provide to PSAPs either "dispatchable location" or "x/y location within 50 meters," for 70 percent of 911 calls, or extend the deadline based on the timing of Voice over LTE (VoLTE) deployment in the provider's network.

June 2 - Submit 911 location accuracy certification with FCC

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

2021

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

April 3 - Provide to PSAPs either "dispatchable location" or "x/y location within 50 meters," for 80 percent of 911 calls, or extend the deadline based on the timing of VoLTE deployment in the provider's network.

April 3 - Provide with wireless 911 calls that have a dispatchable location, upon the request of a PSAP, x- and y-axis (latitude, longitude) confidence and uncertainty information (C/U data) on a per-call basis, specifying the caller's location and the radius in meters from the reported position with a uniform confidence level of 90 percent, per 47 C.F.R. § 20.18(j)(3). Collect and retain the data for two years, and make the data available to PSAPs upon request, per 47 C.F.R. § 20.18(k).

June 2 - Submit 911 location accuracy certification to FCC

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

2022

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

April 3 - If service is provided to any portion of the top 25 Cellular Market Areas (CMAs), deploy in that area either (1) dispatchable location, or (2) z-axis technology that achieves the Commission-approved z-axis metric:

- Where "dispatchable location" is used, populate the National Emergency Address Database (NEAD) with a total number of dispatchable location reference points in the CMA equal to 25 percent of the CMA population.

- Where z-axis technology is used, deploy z-axis technology to cover 80 percent of the CMA population.

June 2 - Submit 911 location accuracy certification to FCC

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

2023

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

2024

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

April 3 - If service is provided to any portion of the top 50 CMAs, deploy in that area dispatchable location, or deploy z-axis technology in compliance with any accuracy metric that has been approved by the Commission.

June 2 - Submit 911 location accuracy certification to FCC

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

2025

February 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

August 1 - Submit live 911 call location data report to FCC, NENA, APCO and NASNA

Accordingly, BlueSky will seek to achieve location accuracy progress as PSAP and industry technology permits to enhance the safety of emergency callers in its service area.

If the Commission requires additional information, BlueSky will be pleased to provide it upon request.

Douglas Creevey
CEO
AST Telecom, LLC d/b/a BlueSky Communications

Date: August 3, 2017